

## EXHIBIT B

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (FM)  
ECF Case

This document relates to:

*Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(FM)

**DECLARATION OF ZOFIA CIESLIK**

I, Zofia Cieslik, hereby declare:

1. I am the spouse of Andrzej Cieslik, who was at 2 World Trade Center on September 11, 2001 and who suffered severe injuries while working there that day. I am in the process of becoming the administrator of his estate. I became a naturalized United States' citizen on [REDACTED] 2000. Attached hereto is a true and accurate copy of my Certificate of Naturalization proving my citizenship status

2. My husband Andrzej died on October 25, 2006. Prior to his death, I heard from him directly about his experiences on September 11, 2001. I have also reviewed documents and records submitted to the Victims Compensation Fund on Andrzej's behalf, which also describe his experience on September 11, 2001 and the injuries he suffered.

3. I provide this statement to describe to the Court what Andrzej went through on September 11, 2001 and thereafter.

4. My husband was born in Krakow, Poland but emigrated to the United States in 1982. He became a naturalized citizen after September 11, 2001, but before he died in 2006. Attached hereto is a true and accurate copy of his Certificate of Naturalization, showing his date of naturalization as [REDACTED], 2005.

5. On September 11, 2001, Andrzej was forty-eight years old and was working at 2 World Trade Center in the lobby of the second floor on a molding machine for a company based out of Tennessee. Andrzej had trained as an electrician in Poland, was a carpenter by trade in New York and was a long-time member of the Carpenter & Joiners Union Local 608.

6. When United Airlines Flight 175 hit 2 World Trade Center, the force from the crash and subsequent explosion rushed down the elevator shafts, blew through the ground level elevator doors and sent a near-explosive column of hot air into the lobby. The pressure from this event knocked Andrzej off his feet and slammed him against a marble pillar.

7. Andrzej hit the pillar hard with his right side upper back, shoulder and neck. After the attacks, Andrzej told me that the sounds and force of the explosion were terrifying, that he feared for his life, and that he was shaking when he got to his feet and managed to escape from the building. He saw an injured co-worker on the ground and helped him out of the building. When the two were outside, a police officer directed them to go to a fire station on Liberty Street for first aid. At the fire station, Andrzej was examined and given pain medication.

8. The first building fell when Andrzej was still at the fire station. Andrzej told me that the sound of the building collapse was deafening and the sight terrifying. He said that he feared for his life again as a huge white cloud of dust and debris rapidly started to approach the building near him and covered everything in sight. Everyone in the fire station, including Andrzej, began to run in panic. When the cloud began to overtake him, Andrzej could not see ahead of him and did not know what to do or where to go. He was having trouble breathing and could hear masses of people running through the streets. He was terrified he would be trampled in the rush. He waited near a mailbox on Fulton Street, and was cowering underneath it when the second building fell. After a while, an eerie darkness descended and Andrzej decided to try



to escape the area. He was disoriented, dizzy and weak and had trouble breathing. He did not get far before he lost consciousness and fell to the ground. A nearby ambulance took him to Beth Israel Hospital.

9. After 6 to 7 hours at the hospital, where Andrzej's eyes were treated, he was given a general examination, received back and neck x-rays and was given pain medication, he then left. The x-rays from Andrzej's emergency room visit revealed no broken bones or dislocations. The treating physician detected tissue damage and recommended that Andrzej get an MRI. This was done on January 3, 2002. The MRI was then reviewed by two neurosurgeons in February 2002. Both agreed that Andrzej had a herniated cervical spinal disc at C6-C7, and that it was causally related to his impact with the pillar on September 11, 2001. Both also agreed that he likely would require surgery, but wanted to try non-invasive treatment first.

10. Andrzej returned to the physician in October 2002 for a follow up examination. The doctor concluded that the physical therapy had been of no assistance and stated that surgery was a reasonable next step. He also noted that Andrzej had increased pain radiating down his right arm with numbness and tingling in his first, second and third fingers. This, he said, indicated more advanced stages of cervical radiculopathy. Finally, noting that Andrzej was a right-handed carpenter with degenerative symptoms in his right hand, the doctor indicated to the worker's compensation board that Andrzej had a moderate partial work disability.

11. On September 12, 2003, Andrzej began receiving worker's compensation benefits and was sent to a neurologist by the New York Worker's Compensation Board for an independent medical examination. The examining physician confirmed the existence of the herniated disc and also identified bulged discs at the C3-C4 and C5-C6 levels. He also diagnosed Andrzej with cervical radiculopathy, which is a dysfunction of the nerve roots at the

cervical spine. The physician prescribed physical therapy three times per week for eight weeks and recommended postponing surgery until the results of the therapy could be assessed.

12. During the months following September 2001, Andrzej also experienced acute pain in his right shoulder. In December 2002, he had an MRI of that area that showed a full thickness tear in one of his tendons, which was attributed to the events of September 11, 2001. Andrzej underwent corrective surgery for the tear in January 2003. However, during a follow up visit in July 2003, his surgeon noted that a partial tear still existed. In addition to the severe and debilitating injury he sustained on September 11, 2001, up until the time of his death on October 25, 2006, Andrzej had to live with pain on a daily basis.

13. Additionally, I witnessed Andrzej struggle with ongoing emotional and psychological damages, demonstrating an extreme fear of death during the events of September 11 and his multiple attempts to escape the area. In the years after September 11, 2001, he suffered from nightmares, severe anxiety, anger and sleep disorders, which I personally witnessed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

1-30-20

Place:

Haverth, NY 11378

Signature:

Zofia Cieslik

Print:

ZOFIA CIESLIK

## CERTIFICATES OF NATURALIZATION



CERTIFICATE OF



No. [REDACTED]

NATURALIZATION

Personal description of holder  
as of date of naturalization:

Date of birth: [REDACTED] 1956

Sex: FEMALE

Height: 5 feet 5 inches

Marital status: MARRIED

Country of former nationality:  
POLAND

INS Registration No. [REDACTED]

*I certify that the description given is true, and that the photograph affixed hereto is a likeness of me.*

*Zofia Maria Cieslik*  
(Complete and true signature of holder)

*Be it known that, pursuant to an application filed with the Attorney General*  
at: NEW YORK, NEW YORK

*The Attorney General having found that:*

ZOFIA MARIA CIESLIK

*then residing in the United States, intends to reside in the United States when so required by the Naturalization Laws of the United States, and had in all other respects complied with the applicable provisions of such naturalization laws and was entitled to be admitted to citizenship, such person having taken the oath of allegiance in a ceremony conducted by the*

US DISTRICT COURT EASTERN DISTRICT

at: BROOKLYN, NEW YORK

on: [REDACTED]

2000

*that such person is admitted as a citizen of the United States of America.*

IT IS PUNISHABLE BY U. S. LAW TO COPY,  
PRINT OR PHOTOGRAPH THIS CERTIFICATE,  
WITHOUT LAWFUL AUTHORITY.

*Raris Tice*  
Commissioner of Immigration and Naturalization

DEPARTMENT OF JUSTICE





## CERTIFICATE OF



## NATURALIZATION

No. [REDACTED]

Personal description of holder  
as of date of naturalization:

Date of birth: [REDACTED], 1954

Sex: MALE

Height: 5 feet 6 inches

Marital status: MARRIED

Country of former nationality:  
POLAND

CIS Registration No. [REDACTED]

I certify that the description given is true, and that the photograph affixed  
hereto is a likeness of me.

*Andrzej Cieslik*

(Complete and true signature of holder)

Be it known that, pursuant to an application filed with the Secretary of  
Homeland Security

at: NEW YORK, NEW YORK

The Secretary having found that:

ANDRZEJ ANTONI CIESLIK

then residing in the United States, intends to reside in the United States when so  
required by the Naturalization Laws of the United States, and had in all other  
respects complied with the applicable provisions of such naturalization laws and  
was entitled to be admitted to citizenship, such person having taken the oath of  
allegiance in a ceremony conducted by the

US DISTRICT COURT EASTERN DISTRICT

at: BROOKLYN, NEW YORK

on: [REDACTED]

2005

that such person is admitted as a citizen of the United States of America.

*Emilio H. [Signature]*

Director, U. S. Citizenship and Immigration Services

IT IS PUNISHABLE BY U. S. LAW TO COPY,  
PRINT OR PHOTOGRAPH THIS CERTIFICATE,  
WITHOUT LAWFUL AUTHORITY.